

4. An installment of real estate taxes on the Property in the amount of \$13,973.34 came due on August 1, 2013. Cathay Bank has been unable to pay that installment, however, given the Asset Freeze Order entered by this Court. (Dkt. No. 27).

5. The taxes due on August 1, 2013 have already begun to accrue late fees. If the taxes remain unpaid, they will ultimately be sold and the purchaser will have the right to foreclose on the Property.

6. Cathay Bank is prepared to pay the tax installment currently due on the Property and any future tax installments that become due pursuant to the Loan Agreement, so long as there are sufficient funds available in the escrow account to pay the full tax installment then due and so long as ACCC remains the title owner of the Property.

7. The United States Securities and Exchange Commission has no objection to the relief sought herein.

7. Allowing Cathay Bank to pay the tax installments from the escrow account will not prejudice any party, and is both economical and necessary to preserve the value of the Property. ACCC thus seeks to modify the Asset Freeze Order to authorize Cathay Bank to pay current and future real estate tax installments due on the Property from the funds held by Cathay Bank in escrow.

8. The [Proposed] Agreed Order submitted concurrently with this motion contains the terms agreed upon by Cathay Bank, ACCC, and the United States Securities and Exchange Commission for the payment of the real estate tax installments due on the Property from escrow.

WHEREFORE, ACCC respectfully urges this Honorable Court to grant its Unopposed Motion for Modification of Asset Freeze Order, to enter the [Proposed] Agreed Order submitted

concurrently with this Motion, and to grant it such other and further relief as this Court deems just and proper.

Respectfully submitted,

A CHICAGO CONVENTION CENTER, LLC

DATED: September 20, 2013

By: /s/ Scott Mendeloff
One of Their Attorneys

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